

# **Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

HOPE ESCORT, and ANTHONY BARRATT  
on behalf of themselves and all similarly situated  
individuals,

Plaintiffs,

v.

CITIGROUP, INC., CITIBANK, N.A.,  
CITIGROUP TECHNOLOGY, INC., OPEN  
SYSTEMS TECHNOLOGIES, INC. and  
PRINCETON INFORMATION LTD.

Defendants.

**Case No.: 1:15-cv-04487-VSB**

**[PROPOSED] ORDER GRANTING  
PRELIMINARY APPROVAL OF SETTLEMENT**

On \_\_\_\_\_, 2016, the Court heard an unopposed motion for approval of settlement by Plaintiffs Hope Escort and Anthony Barratt (collectively “Class Representatives”). The Court has considered the Joint Stipulation of Class and Collective Action Settlement and Release (“Stipulation”) and the proposed Notice of (1) Proposed Class and Collective Action Settlement and (2) Final Settlement Approval Hearing (“Class Notice”) and attached exhibits and hereby finds and orders as follows:

The Court finds on a preliminary basis that the settlement memorialized in the Stipulation, filed with the Court, falls within the range of reasonableness and, therefore, meets the requirements for preliminary approval.

The Court conditionally certifies, for settlement purposes only, the following class (“Class”) described in the Stipulation: all individuals employed by Defendants Princeton Information Ltd. (“PI”), Baha Industries Corp. d/b/a Open Systems Technologies (“OST”), and/or third parties RMS Computer Corporation (“RMS”), Sans Consulting Services, Inc. (“SCS”), and Mitchell Martin, Inc. (“MMI”) and provided services to Defendants Citigroup Inc., Citigroup Bank, N.A., Citigroup

Technology, Inc. (collectively, “Citi”), and/or any other Citi affiliate in the position of “Know Your Customer” or “KYC” Analyst for one or more days between June 10, 2009 and the Preliminary Approval Date.

The Court finds, for settlement purposes only, the requirements of Federal Rule of Civil Procedure 23(a) and Federal Rule of Civil Procedure 23(b)(3) are satisfied, with the exception of the manageability requirement of Rule 23(b)(3) that the Court need not address for purposes of settlement.

This Order, which conditionally certifies a class action for settlement purposes only, shall not be cited in this or any matter for the purpose of seeking class or collective certification, opposing decertification, or for any other purpose, other than enforcing the terms of the Stipulation.

The Court appoints, for settlement purposes only, as Class Representatives Hope Escort and Anthony Barratt.

The Court appoints, for settlement purposes only, Andrew. R. Frisch of Morgan & Morgan, PA as Class Counsel for the purposes of Settlement and the releases and other obligations therein. Simpluris is appointed as Settlement Administrator.

This Order bars the Class Representatives, Class Members, and Class Counsel from filing or prosecuting any other claims covered by the releases set forth in the Stipulation.

The Class Notice, attached to the Motion for Preliminary Approval as Exhibit B, and the Claim Form, Inconsistent Documentation Form, and Change of Name and/or Address Information, attached to the Class Notice as Forms A through C, respectively, are approved. The Settlement Administrator is ordered to mail those documents to the Class Members as provided in the Stipulation.

Each Class Member who does not timely submit a valid written request for exclusion from the Settlement will have forty-five (45) days after the date on which the Settlement Administrator mails the Class Notice to object to the Settlement by serving on the Settlement Administrator, Class

Counsel, and Counsel for Defendants, and filing with the Court, by the forty-five (45) day deadline, a written objection to the Settlement.

The Court will conduct a Final Approval Hearing on \_\_\_\_\_, 2016 at \_\_\_\_ a.m./p.m. to determine the overall fairness of the settlement, attorneys' fees and costs to Class Counsel, and enhancements to the Class Representatives. The Final Approval Hearing may be continued without further notice to Class Members. Class Counsel shall file their motion for final approval of the settlement sought in the Stipulation, including for approval of attorneys' fees, costs, and the enhancements for the Class Representatives sought in the Stipulation, on or before \_\_\_\_\_, 2016.

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2016

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Hon. Vernon S. Broderick  
United States District Judge